

# FAULKNER, HOFFMAN & PHILLIPS, LLC

**ATTORNEYS AT LAW**

June 19, 2018

Invoice submitted to:

IRONWORKERS DISTRICT COUNCIL OF SOUTHERN OHIO & VICINITY  
COLLECTIONS ACCOUNT  
Ms. Penny Brown, Administrative Manager  
1470 Worldwide Place  
Vandalia, OH 45377

In Reference To: Iron Workers District Council of  
Southern Ohio & Vicinity Benefit Trust,  
et al. v. Huber, Inc., et al.  
Southern District of Ohio Case No.  
3:18-cv-129

For Professional Services Rendered

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
3/20/2018	MTH	Tel. conf. w/ P. Gotthardt regarding situation; review settlement agreement between Contractor & the Funds; draft & send demand letter for remaining unpaid amounts; re: Huber Inc, LLC	1.25	\$225.00/hr	\$281.25
4/13/2018	DMP	Review file & documents provided by Fund office on Huber delinquency; tel. conf. w/ C. Huber; discuss status of delinquency & payments submitted; discuss status of delinquency & employer's failure to submit monthly remittance reports; work on draft of lawsuit for delinquent contributions, liquidated damages, interest & dues; re: Huber (Litigation)	2.25	\$200.00/hr	\$450.00
4/16/2018	DMP	Continue working on draft complaint on claims for breach of fiduciary duties & prohibited transaction by principals; research officers & owners to be named in lawsuit; research status	1.50	\$200.00/hr	\$300.00



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## IRONWORKERS DISTRICT COUNCIL OF SOUTHERN OHIO &amp; VICINITY

June 19, 2018

Page 2

			Hours	Rate	<u>Amount</u>
of corporation w/ Secretary of State for Ohio; re: Huber (Litigation)					
4/17/2018	DMP	Tel. conf. w/ P. Gotthardt; discuss amounts owed by Huber Inc; review draft of previous settlement agreement re liquidated damages & interest; update draft complaint w/ amounts from revised litigation fact sheet; edit & revise complaint; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
4/18/2018	DMP	Review settlement agreement regarding liquidated damages & interest; evaluate enforceability re unsigned agreement; update lawsuit to include claim for breach of settlement agreement; re: Huber (Litigation)	1.25	\$200.00/hr	\$250.00
4/19/2018	DMP	Email to P. Gotthardt; tel. conf. w/ D. Baker; update & revise lawsuit; prepare exhibits to complaint; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
4/23/2018	DMP	Follow-up w/ JCH re joint check arrangement; re: Huber (Litigation)	0.25	\$200.00/hr	\$50.00
5/1/2018	JCH	Review delinquency; contact Skanska U.S.A.; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
5/2/2018	JDM	Review ECF notices related to lawsuit filing; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
	DMP	Investigate potential bond claim on UC Fifth Third project; review George Steel; draft letter to George Steel re potential joint check arrangement & preserve rights to file bond on Arena	1.25	\$200.00/hr	\$250.00



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## IRONWORKERS DISTRICT COUNCIL OF SOUTHERN OHIO &amp; VICINITY

June 19, 2018

Page 3

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		Project; status update to P. Gotthardt re bond claim & service of lawsuit; re: Huber (Litigation)			
5/3/2018	JCH	Tel. conf. w/ Skanska; tel. conf. w/ George Steel; send information; re: Huber (Litigation)	0.50	\$225.00/hr	\$112.50
5/4/2018	DMP	Investigate potential bond claims; request documents & information from D. Baker & George Steel; re: Huber (Litigation)	0.50	\$200.00/hr	\$100.00
5/7/2018	JDM	Review ECF notice related to pending collections case; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
5/9/2018	DMP	Investigate potential lien & bond claims for ongoing projects & recently completed projects; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
5/10/2018	DMP	Follow-up re George Steel; tel. conf. w/ B. Frost & K. Nickel re Fifth Third Arena project & joint check agreement; draft joint check agreement; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
5/15/2018	DMP	Research status of Blue Ash project at Summit Park; tel. conf. w/ E. George re status of work & other projects involving Huber; call to D. Rack from Turner Construction; tel. conf. w/ B. Frost at George Steel re potential joint check arrangement; draft email to B. Frost from George Steel re joint check arrangement; draft demand to C. Huber re documents & information required to prepare bond claims;	1.50	\$200.00/hr	\$300.00

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## IRONWORKERS DISTRICT COUNCIL OF SOUTHERN OHIO &amp; VICINITY

June 19, 2018

Page 4

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		update to P. Gotthardt re status of lawsuit re: Huber (Litigation)			
5/16/2018	JCH	Review correspondence & emails on projects & litigation; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
5/18/2018	JDM	Review ECF notice & application for entry of default; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
5/21/2018	JDM	Review ECF notice & entry of default; re: Huber (Litigation)	0.25	\$225.00/hr	\$56.25
5/22/2018	DMP	Tel. conf. w/ C. Huber on status of delinquency; email to counsel for Huber; tel. conf. w/ B. Geisen on status of delinquency & potential settlement agreement to be submitted to the Trustees for approval; exchange emails w/ B. Geisen re status of lawsuit and default entry; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
5/23/2018	DMP	Review April contribution report; follow-up re Local 44 union dues & reports; review documents provided to Funds & documents required to determine total amounts owed; re: Huber (Litigation)	0.50	\$200.00/hr	\$100.00
5/24/2018	DMP	Review reports received from counsel for Huber re Local #44; work on chart to calculate interest on unpaid dues; coordinate w/ P. Gotthardt on work performed in Local #70 & #172; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00

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June 19, 2018

Page 5

		Hours	Rate	<u>Amount</u>
5/25/2018	DMP Email from P. Gotthardt re calculation of dues owed to Local #70 based on reports submitted by Huber; re: Huber (Litigation)	0.25	\$200.00/hr	\$50.00
5/30/2018	DMP Tel. conf. w/ counsel for Huber re status of settlement proposal w/ the Funds & Local Unions; further investigation into potential bond claims & joint check arrangements re ongoing projects; re: Huber (Litigation)	0.75	\$200.00/hr	\$150.00
	For professional services rendered	17.75		\$3,631.25
	Additional Charges :			
4/19/2018	JCH U.S. District Court Filing Fee; re: Huber (Litigation)			\$400.00
	Total additional charges			\$400.00
	Total amount of this bill			\$4,031.25
	Balance due			\$4,031.25

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*Attorneys & staff designated as follows: George H. Faulkner (GHF), Joseph C. Hoffman (JCH), Robert M. Phillips (RMP), Joseph D. Mando (JDM), David M. Pixley (DMP), Sara A. Liva (SAL), Melinda A. Pukanski (MAP), Linda G. Stein (LGS), Hallie L. Buher (HLB) and David G. Faulkner (DGF), of counsel.*

The Ohio Supreme Court Disciplinary Rules provide that attorneys' fees are to be based upon the hours spent; the results obtained; the urgency of the matter; the experience, reputation and ability of the attorneys involved; and the novelty and difficulty of the issue involved. Our fees for all lawyers and paralegals are computed in accordance with the Supreme Court Rules. If you have any questions, please call our office. Thank you for your continued support by our representation of your legal affairs.

Faulkner, Hoffman & Phillips, LLC

*George H. Faulkner*

